

May 28, 2004

Mr. Douglas B. MacDonald  
Secretary of Transportation  
State of Washington  
Transportation Building  
PO Box 47316  
Olympia, WA 98504-7316

Hon. Greg Nickels  
Mayor  
City of Seattle  
Seattle City Hall  
600 Fourth Avenue, 7th Floor  
Seattle, WA 98104-1876

**Re: Port of Seattle—Viaduct/Seawall Replacement DEIS Comments**

Dear Secretary MacDonald and Mayor Nickels:

Thank you for the opportunity to comment on the *Draft Environmental Impact Statement for the SR 99: Alaskan Way Viaduct & Seawall Replacement Project*. On behalf of the Port, I would also like to thank the project team for the effort it has made to date. The amount, quality, and openness of its work are outstanding. We very much appreciate the team's effort, and its willingness to provide an opportunity for Port staff to participate in the process. This already allowed us to include many Port concerns in the analysis, even if they are not addressed directly in the document we are commenting on today. We are looking forward to continue working with the project team to address these and other, as yet unidentified, issues.

The project is vital to the Port's and the region's future. While we express a number of concerns about potential impacts of the replacement project, we want to ensure that the project moves forward as quickly as possible.

The impact of a loss of the roadway capacity and local access provided by the Alaskan Way Viaduct and the surface street—and the railroad mainline capacity that is dependent on the protection of the seawall—would be catastrophic. The region's economic life and well-being depends on the service provided by these facilities. SR 99 keeps our transportation system operating, as demonstrated after the February 2001 earthquake, when closures and limitations were placed on the viaduct, and commute-hour traffic was gridlocked throughout the region. The Port of Seattle is a critical gateway for goods moving to and from Chicago and other major Midwest and East Coast markets. Given that international trade routes are dependent on a functioning regional system, impacts from a long-term closure of the corridor would ripple through the state and national economy.

The viaduct is critical for the efficiency of our cargo terminals operations. Container trade through the Port was 1.5 million 20-foot equivalent units (TEUs) last year. The value of two-way waterborne trade is about \$30 billion per year, which arrives at and departs Seattle primarily via rail and truck, using or passing under SR 99. Operations at Port of Seattle marine terminals support more than 18,000 jobs in the region and generate \$895 million annually in wages and salaries and \$107 million in state and local taxes each year (Martin and Associates report, September 2000). The value of international cargo moving among these areas was estimated at nearly \$100 billion in 1997 (BST Associates report, January 1999). All this risks being lost to other US ports if congestion caused by a loss of the viaduct reduces the time advantage that we otherwise achieve.

The SR 99 corridor is important for access to the Port of Seattle's two cruise-ship terminals at Pier 66 and Terminal 30. In 2004, the Port expects about 150 homeport cruise visits with about 300,000 passengers. Annual growth over the next 10 years is projected at 5-10%. A 2004 Martin

and Associates study estimates the cruise business will generate about 1,700 jobs and more than \$200 million in business revenue for the community this season.

Following are the Port's comments on major issues related to the DEIS.

**1. The capacity and functionality of the corridor must be maintained.**

- In previous comments, we have stated that, since no increase in capacity is planned for the I-5 corridor, capacity increases in the SR 99 corridor should be considered. (Please see our letter of July 19, 2002.) The analysis has since shown that this is probably not feasible. It is imperative, however, that the existing capacity and level of service in the corridor is maintained.
- The DEIS indicates that some alternatives may reduce the capacity of surface arterial streets, such as Alaskan Way surface. We urge you to ensure that these arterials, and in particular Alaskan Way surface, do not lose any capacity that supports existing uses, including general-purpose traffic, transit, freight delivery and over-legal trucks, tourist activities, ferries (both state and private), and cruise ship access.
- Some alternatives presented in the DEIS eliminate the Elliott/Western ramps. These entry and exit points are necessary to facilitate freight movement between the Duwamish and Ballard/Interbay Industrial and Manufacturing areas and must be part of any design solution. They also provide important access to the north waterfront, Ballard, Interbay, Magnolia, west Queen Anne, and the Port facilities located in these neighborhoods, including Terminal 91, Fisherman's Terminal and Shilshole Bay Marina.
- We support the six-lane tunnel design option on the central waterfront. It provides needed corridor capacity and supports a vibrant, attractive waterfront.

**2. Complementary regional system upgrades and connections are important.**

The SR 99 corridor enables traffic flows to and along the west side of the City, as well as connections to the western side of King County. Connections beyond the study area of this project require our efforts as well. We continue to encourage you develop a replacement facility and regional system that provide efficient access to the:

- Northeast through Mercer to I-5 and SR 520;
- Northwest along Elliott and 15<sup>th</sup>;
- East on SR 519 and the Spokane Street Viaduct to the interstate system;
- South to the First Avenue Bridge and SR 509; and
- North Waterfront in the vicinity of Broad Street.

**3. Freight mobility and access to the waterfront are crucial to our customers and the region as a whole.**

- The loss of the viaduct would hamper our container terminal operations throughout the harbor. We cannot afford disruption of the corridor, or the BNSF mainline. This would have a major detrimental impact on freight mobility in the region because lack of these facilities would dramatically increase pressure on other facilities that are already stressed. In addition to making contingency plans for a loss of the viaduct, the project should determine the potential of a seawall collapse on the BNSF mainline north of the tunnel portal and, if warranted, include this scenario in its contingency planning efforts.

- The viaduct and Alaskan Way surface are important local truck routes. Final design must ensure that freight mobility needs, including those of over-legal trucks and those carrying hazardous materials, are met.
- The capacity and functionality of rail operations in the harbor must be maintained. The rail facilities are critical for viable operations at our three container terminals.
- The DEIS assumes that the Broad Street underpass will be built in advance of the project. We are concerned that a permanent grade separation is no longer planned although it is still needed. The project should explore the feasibility of constructing a grade separation that would accommodate viaduct construction as well as long-term needs.

**4. Access to and use of Port properties must be protected.**

Terminal 46:

- Our analysis indicates that neither the aerial nor surface design option for the south segment, as described in the DEIS, provide for functional container operations. Both of these options, as shown, would take property that is critical to the functionality of T-46 as a container terminal. We are also concerned that the alignment with SR 99 on the surface does not provide adequate access to the facility.
- We support current efforts to modify both options in order to accommodate the container terminal performance levels that exist today. We are considering design and operational solutions that:
  - Provide for container drayage trucking (e. g. curve radii, grades, and signals);
  - Ensure access to the two rail yard gates to the south;
  - Ensure access to the east to the North SIG Yard and the regional highway system; and
  - Support railroad intermodal activity.
- It is imperative that Hanjin, our tenant at Terminal 46, be able to operate as they currently do—both during construction and with a replacement facility. The \$70 million investment the County's taxpayers are currently making in this terminal can multiply the benefits to the region's economy only if container operations are not affected.

Pier 48:

- The DEIS assumes that uplands of the Port's P-48 will be used for ferry access/holding. This has not yet been negotiated.
- The DEIS indicates that the project would eliminate the Port's Alaska Square Park public access. The project must replace this public access elsewhere, it is part of a mitigation requirement for T-46.

Cruise Terminals at Pier 66 and Terminal 30:

- We are very concerned that the DEIS does not address detrimental impacts on the cruise terminals—in particular at Pier 66, in the heart of the north central project. This summer, at these two facilities, we expect about 150 port calls serving about 500,000 passengers, requiring access for passengers, crew, and deliveries. Alaskan Way surface variants, as illustrated in DEIS, appear to eliminate the curb passenger load/parking zone along the north waterfront. This could have a major impact on passenger drop-off and loading at Pier 66.

Pier 69:

- The Victoria Clipper, our tenant at Pier 69, also requires a curb lane for passenger access.

Lenora Street Pedestrian Bridge:

- The bridge is proposed to be demolished for construction. It is owned by the Port and subject to a public pedestrian easement. As a critical pedestrian link between the waterfront and Pike Place Market, it must be replaced by the project.

**5. Construction impacts to Port facilities must be minimized.**

The DEIS provides an overview of the impacts of construction throughout the corridor. We have two major concerns in this area:

- 1) The analysis of the construction impacts on Port of Seattle facilities and other waterfront properties is limited and does not provide the level of detail or appropriate mitigation measures that we would typically expect to see discussed in an EIS. We understand that a more meaningful analysis of the construction impacts can occur once a preferred alternative is identified. However, given the likely magnitude of the traffic and socio-economic impacts of construction on Port facilities and tenants, as well as other waterfront businesses, we must urge you to complete a more substantial analysis of these construction impacts once the preferred alternative has been identified. After completion of the analysis, it will be essential to provide sufficient opportunity for comment and negotiation of any mitigation needs before the FEIS process is completed. We have identified three options for achieving this goal:

One option would be to analyze the likely construction impacts of a preferred alternative, identify the appropriate mitigation for those impacts, include both in the Final Environmental Impact Statement (FEIS), and then provide an opportunity for public comment on the FEIS. If the lead agencies chose this option, the analysis of impacts, identification of appropriate mitigation and opportunity for public comment should be the functional equivalent of what would normally exist for a DEIS.

A second approach would be to prepare a supplemental EIS once the City and the State identify a preferred alternative and analyze the probable significant impacts of that alternative in the FEIS. This supplemental EIS could be narrowly scoped to analyze the probable construction impacts of the preferred alternative only and identify the appropriate mitigation for those impacts.

As an alternative, or possibly in addition to these approaches, we request that the State and the City enter into an agreement with the Port outlining a specific construction phasing and staging plan, including any necessary mitigation measures, to protect Port businesses and tenant operations during construction. This agreement should be developed before the completion of the environmental review process, and we expect that it would be incorporated into bid specifications of the contract. Such an agreement will be particularly important if the project is built under a design-build contract.

- 2) Both temporary detour facilities would have a profound impact on the waterfront. More detailed analysis by the design team and Port staff will be required before a decision is made. Given the cost and impacts of the temporary detour facilities, we are also interested in a substantive analysis of project cost and duration of construction if there were no provisions for through-traffic. The trade-offs between construction duration and project cost must be carefully weighed against increased travel times and socio-economic impacts. We expect to have an opportunity to review

and comment on your analysis of construction corridors, staging and phasing and to work with the project team in evaluating these trade-offs.

Based on the limited information contained in the DEIS, we are also concerned about the following issues:

- The periodic closures described in the DEIS are bound to create significant impacts and costs for both the regional system and the ability of our facilities to function. More substantive analysis will be needed. Our staff will work with the project team to ensure that our tenants and customers can continue to operate efficiently during construction.
- The capacity and functionality of rail operations in the harbor must be maintained. These rail facilities are critical for viable operations at our three container terminals.
- We support the project team's effort to focus general-purpose traffic in the south-end on 1<sup>st</sup> and 4<sup>th</sup> Avenues, dedicating East Marginal Way to freight and local access.
- Construction staging, detours, and capacity reductions on surface streets could have a profound impact on T-30, T-46 and P-48. It will be especially important to maintain unimpeded access to Terminal 46 for container terminal operations.
- Any construction-related lane closures or detours should also be designed to maintain existing access to Piers 66 and 69, in particular for passengers and deliveries to cruise ships and passenger ferries.
- We support the aggressive traffic management program outlined in the Flexible Transportation Package. However, we are concerned about the impacts of potentially higher-than-planned single occupant vehicle traffic and that proposed truck curfews would limit freight movement to an even narrower time window.

Thank you again for the opportunity to participate in this project and comment on this Draft Environmental Impact Statement. The Port strongly supports the project, and I wish to express the Port's thanks to the project team members for their close cooperation. The Port believes the project must continue to move forward expeditiously.

The Port also will send a more detailed technical set of comments to WSDOT's SEPA Responsible Official, Allison Ray. We look forward to continuing work with your project team to define and fund a project that will replace the SR 99 Viaduct and the City's aging seawall.

Sincerely,  
Paige Miller  
President  
Port of Seattle Commission

Cc: Allison Ray, WSDOT

Bcc: Port Commissioners, Dinsmore, Strout, Okamoto, Sheldon, Merritt, Goodwin, S. Jones, Wolf, M. Holbrook, Poor